

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

KATIANA SOENEN, TAJA HIRATA-EPSTEIN,  
CHLOE BURNS, EMMA DENNIS-KNIERIEM,  
JANE DOES 1-2, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

C.A. No.: 21-cv-325-JJM-PAS

BROWN UNIVERSITY,

Defendant.

**DEFENDANT BROWN UNIVERSITY’S MOTION TO SEVER THE CLAIMS OF THE  
FORMER STUDENT PLAINTIFFS INTO INDIVIDUAL LAWSUITS**

Defendant Brown University (“Brown”) moves that the Court sever from this putative class action the individualized claims seeking monetary damages pled by three former Brown students, Katiana Soenen, Taja Hirata-Epstein, and Emma Dennis-Knieriem. Applying Federal Rules of Civil Procedure 20(a) and 21, these three Plaintiffs do not satisfy the requirements for the permissive joinder of their claims and their misjoined claims should be severed into separate lawsuits to adjudicate their individualized liability and damages claims.

Brown has filed a memorandum in support of this motion. Pursuant to Local Rule Cv. 7, Brown requests oral argument on its motion, which it estimates will require one hour of time on the Court’s calendar.

BROWN UNIVERSITY

By Its Attorneys,

/s/ Steven M. Richard  
Steven M. Richard (#4403)  
Caitlyn Smith (#10361)  
Nixon Peabody LLP  
One Citizens Plaza, Suite 500  
Providence, RI 02903  
Tel: 401-454-1000 / Fax: 401-454-1030  
[srichard@nixonpeabody.com](mailto:srichard@nixonpeabody.com)  
[cxsmith@nixonpeabody.com](mailto:cxsmith@nixonpeabody.com)

**CERTIFICATE OF SERVICE**

I certify that, on this 3rd day of January, 2023, this motion to sever was filed and served through the Court's CM/ECF system.

/s/ Steven M. Richard